

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

JAN 28 1 50 PM '93

POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON
(UPS/PSA-T1-12 through 19)**

(January 28, 1998)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to Parcel Shippers Association witness Jellison (UPS/PSA-T1-12 through 19).

Respectfully submitted,



John E. McKeever
Albert P. Parker, II
Stephanie Richman
Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP
1600 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103-7286
(215) 751-2200

and

1225 Eye Street, N.W., Suite 600
Washington, D.C. 20005-3914
(202) 463-2900

Of Counsel.

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON**

UPS/PSA-T1-12. Please identify all members of the Parcel Shippers Association.

UPS/PSA-T1-13. (a) Do any of the members of the Parcel Shippers Association use CTC? If so, please list how many members of the Association use CTC and the approximate number of parcels shipped through CTC during 1997.

(b) Do any of the members of the Parcel Shippers Association use the services of consolidators or drop-shippers other than CTC? If so, identify all such consolidators or drop-shippers, the number of Association members who use consolidators or drop-shippers other than CTC, and the approximate volume of parcels sent through such consolidators or drop-shippers during 1997.

UPS/PSA-T1-14. On page 3 of your testimony, you state that "Members shipped 124,522,000 Standard (B) Parcel Post by USPS" Did you mean to use the word "Respondents" rather than the word "Members" in making that statement?

UPS/PSA-T1-15. On page 4 of your testimony concerning the "OMBC (sic) Discount," you state that of the respondents to the question whether an Association member is currently eligible for the OBMC discount, 17 responded that they were eligible and 10 responded that they were not eligible, for a total of 27 responses. Please reconcile that total with your indication on the same page that 26

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON**

members responded to the question whether they are currently eligible for the OBMC discount.

UPS/PSA-T1-16. Please refer to that portion of page 5 of your testimony which indicates that 2 respondents "already use consolidators." Identify the consolidators used by those 2 respondents and the total volume (for both combined) sent by the consolidators used by these two respondents during 1997.

UPS/PSA-T1-17. Please refer to the discussion of the DDU discount on page 6 of your testimony. You there indicate that of 30 respondents, 4 currently qualify for the DDU rates, 7 who do not currently qualify would "do the work to become eligible," and 12 "would be willing to use a consolidator," for a total of 23 respondents. Please reconcile this total with your statement that of the 30 respondents, 21 "either currently qualify or would do whatever is necessary, including using a consolidator to qualify."

UPS/PSA-T1-18. Please refer to footnote 1 on page 7 of your testimony and the accompanying text.

(a) Is CTC a member of the Parcel Shippers Association, and, if so, did it respond to the survey?

**INTERROGATORIES FROM UNITED PARCEL SERVICE
TO PARCEL SHIPPERS ASSOCIATION WITNESS JELLISON**

(b) Provide the total amount of "the parcel post volumes reported by CTC" which were excluded from the "current total volume of parcel post shipped by USPS [of] 124,522,000."

(c) On page 5 of your testimony, you indicate that two respondents "already use consolidators." Please provide the volume which those two respondents reported as sending by parcel post.

UPS/PSA-T1-19. Please refer to page 8 of your testimony, where you state that "Not all [of the parcels which are already barcoded] are barcoded with a code that can be read by an OCR." Please provide your basis for that statement.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: January 28, 1998
Philadelphia, PA